

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

UNITED STATES OF AMERICA,
v.
ZACKARY ELLIS SANDERS,
Defendant.

Case No. 1:20-cr-00143
Honorable T.S. Ellis, III
Trial: Oct. 19, 2021

DEFENDANT'S REVISED PROPOSED VERDICT FORM

Mr. Zackary Ellis Sanders, through counsel, respectfully requests that the Court use the attached verdict form at trial in the above captioned matter.

Respectfully submitted,

/s/
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VERDICT FORM

COUNT ONE

With respect to Count One, production of child pornography:

We, the jury, find Defendant, Zackary Ellis Sanders:

Not Guilty: _____ Guilty: _____

If guilty, we unanimously agree that [] GX 505B is a visual depiction of a minor engaging in sexually explicit conduct.

COUNT TWO

With respect to Count Two, production of child pornography:

We, the jury, find Defendant, Zackary Ellis Sanders:

Not Guilty: _____ Guilty: _____

If guilty, we unanimously agree that [] GX 511J is a visual depiction of a minor engaging in sexually explicit conduct.

COUNT THREE

With respect to Count Three, production of child pornography:

We, the jury, find Defendant, Zackary Ellis Sanders:

Not Guilty: _____ Guilty: _____

If guilty, we unanimously agree that [] GX 503E and/or [] GX 503J and/or [] GX 503P is/are a visual depiction(s) of a minor engaging in sexually explicit conduct.

COUNT FOUR

With respect to Count Four, production of child pornography:

We, the jury, find Defendant, Zackary Ellis Sanders:

Not Guilty: _____ Guilty: _____

If guilty, we unanimously agree that [] GX 509G is a visual depiction of a minor engaging in sexually explicit conduct.

COUNT FIVE

With respect to Count Five, production of child pornography:

We, the jury, find Defendant, Zackary Ellis Sanders:

Not Guilty: _____ Guilty: _____

If guilty, we unanimously agree that [] GX 501R and/or [] GX 501V and/or [] GX 501X is/are a visual depiction(s) of a minor engaging in sexually explicit conduct.

COUNT SIX

We, the jury, find Defendant, Zackary Ellis Sanders:

Not Guilty: _____ Guilty: _____

If guilty, we unanimously agree that [] GX 507H and/or [] GX 507J is/are a visual depiction(s) of a minor engaging in sexually explicit conduct.

COUNT SEVEN

We, the jury, find Defendant, Zackary Ellis Sanders:

Not Guilty: _____ Guilty: _____

COUNT EIGHT

With respect to Count Eight, receipt of child pornography:

We, the jury, find Defendant, Zackary Ellis Sanders:

Not Guilty: _____ Guilty: _____

COUNT NINE

With respect to Count Nine, receipt of child pornography:

We, the jury, find Defendant, Zackary Ellis Sanders:

Not Guilty: _____ Guilty: _____

COUNT TEN

With respect to Count Ten, receipt of child pornography:

We, the jury, find Defendant, Zackary Ellis Sanders:

Not Guilty: _____ Guilty: _____

COUNT ELEVEN

With respect to Count Eleven, receipt of child pornography:

We, the jury, find Defendant, Zackary Ellis Sanders:

Not Guilty: _____ Guilty: _____

COUNT TWELVE

With respect to Count Twelve, possession of child pornography:

We, the jury, find Defendant, Zackary Ellis Sanders:

Not Guilty: _____ Guilty: _____

If guilty, we unanimously agree that [] GX(s) _____ is/are a visual depiction(s) of a minor engaging in sexually explicit conduct.

*If your verdict is not guilty as to Count Twelve, please do not answer the following question.
If your verdict is guilty as to Count Twelve, please answer the following question:*

Did a visual depiction involved in the offense charged in Count Twelve, GX(s)

_____ involve a prepubescent minor or a minor who had not attained 12 years of age?

No: _____

Yes: _____

So say we all this _____ day of _____, 2021.

Foreperson

CERTIFICATE OF SERVICE

I hereby certify that on this 26th day of October 2021, the foregoing was served electronically on the counsel of record through the US District Court for the Eastern District of Virginia Electronic Document Filing System (ECF) and the document is available on the ECF system.

/s/ Jonathan Jeffress
Jonathan Jeffress